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7 IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 JOHN BABAROVICH,

9 Plaintiff,

10 vs.

11 STANDARD GUARANTY INSURANCE
COMPANY, a Delaware Corporation,

12 Defendant.
13

NO. C19-1395 RSM

STIPULATED MOTION AND AGREED
ORDER TO EXTEND CASE
DEADLINES

14 **STIPULATION**

15 COMES NOW Plaintiff John Babarovich (“Babarovich”) and Defendant Standard
16 Guaranty Insurance Company (“SGIC”) (collectively, the “Parties”), by and through their
17 counsel of record and, pursuant to FRCP 26, LCR 7(d)(1) and 10(g), and the Court’s September
18 4, 2019 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. 5),
19 file this Joint Motion to extend the case scheduling deadlines set by the Court by 45 days, as
follows:

- 20 1. FRCP 26(f) Conference November 12, 2019
21 2. Initial Disclosures November 18, 2019
22 3. Joint Status Report and Discovery Plan November 25, 2019
23

24 STIPULATED MOTION AND AGREED ORDER - Page 1

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Attorneys at Law
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1 This is the first request by the Parties to extend these deadlines.

2 In support of the Joint Motion, the Parties show the Court as follows:

3 On September 27, 2019, counsel for SGIC emailed counsel for Babarovich in order to
4 arrange a time to conduct the FRCP 26(f) conference. Counsel for Babarovich, Gregory, Ursich,
5 advised he was unable to meet by the Court's original October 2, 2019 deadline due to deposition
6 and trial preparation obligations. Mr. Ursich has, to date, been unable to meet with counsel for
7 SGIC due to time significant time constraints from his existing and pending trials, including a
8 trial commencing on Monday, October 21, 2019. Counsel for SGIC is agreeable to an extension
9 of the case deadlines in order to permit additional time for Mr. Ursich to complete his existing
10 and pending trials and for the Parties to meaningfully meet and confer in order to set a schedule
11 for the prompt completion of the case.

12 THEREFORE, the Parties jointly move the Court for an Order extending the FRCP 26(f)
13 conference to November 12, 2019, the Initial Disclosure deadline to November 18, 2019 and the
14 Joint Status Report and Discovery Plan deadline to November 25, 2019. Attached is a proposed
15 Order granting the Joint Motion.

16 INSLEE BEST DOEZIE & RYDER, P.S.

COZEN O'CONNOR

17 _____
18 Gregory L. Ursich WSBA #18614
Attorney for Plaintiff John Babarovich

Kevin A. Michael WSBA #36976
Attorney for Defendant Standard
Guaranty Insurance Company

19 DATED on this ____ day of October, 2019

DATED on this ____ day of October, 2019

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1 **II. AGREED ORDER**

2 IT IS, based on the above stipulation of counsel for all Parties, hereby ORDERED that
3 the pending deadlines are extended as follows:

- 4 1. FRCP 26(f) Conference November 12, 2019
5 2. Initial Disclosures November 18, 2019
6 3. Joint Status Report and Discovery Plan November 25, 2019

7 IT IS SO ORDERED this 18th day of October 2019.

8 

9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE

11 So stipulated and presented by:

12 INSLEE, BEST, DOEZIE & RYDER, P.S.

13 By _____
14 Gregory L. Ursich, WSBA No. 18614
15 Attorney for John Babarovich
16 10900 NE 4th Street, Suite 1500
17 Bellevue, Washington 98004
18 Tel: (425) 455-1234
19 Fax: (425) 635-7720999
20 Email: gursich@insleebest.com

21 So stipulated and copy received:

22 COZEN O'CONNOR

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24 Kevin A. Michael, WSBA # 36976
25 Craig H. Bennion, WSBA #11646
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